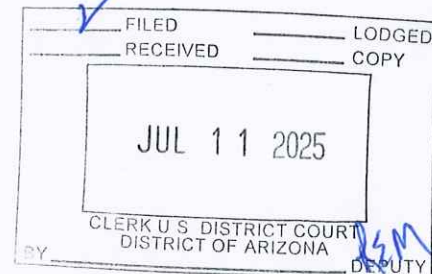


July 4, 2025

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Marcus Hinton

Vanessa Hinton

Veronica Hinton

Vs.

County of Cochise, et al.,

Defendants.

Case - 4-23-Cv-00482-MSA -JAS

To the Honorable Judge Maria S Aguilera

MOTION FOR SANCTIONS BY DEFAULT AGAINST DEFENDANTS MAERS, REQUEST FOR ENTRY OF  
DEFAULT JUDGMENT, AND REQUEST FOR EXPEDITED PAYMENT WITHIN 48 HOURS

Plaintiffs respectfully submits this Motion pursuant to Rule 6 and the Court's inherent authority,  
requesting:

Entry of default sanctions against the MAERS defendants;

1. Issuance of default judgment in the maximum allowable amount permitted by law;
2. Order requiring immediate payment within 48 hours, with further sanctions if not paid timely.

## I. BACKGROUND

On June 18, 2025, Plaintiffs filed a Motion for Sanctions against Defendants MAERS based on their repeated failures to participate in this

case, obstructive conduct throughout this case, and intimidation efforts involving Plaintiff's family as witnesses. The MAERS defendants have failed to file any opposition or response within the 14-day deadline as required under Federal Rule of Civil Procedure 6.

This silence follows a disturbing pattern of behavior. Since Plaintiffs initiated this lawsuit in October 2023, the MAERS defendants have filed only one answer, merely stating "denied claim" and have otherwise ignored all deadlines, correspondences, and responsibilities to this Court. Their neglect has caused severe harm and prolonged suffering—most urgently for Plaintiff's youngest sister and aunt Veronica Hinton, who is gravely ill and whose life expectancy is now uncertain.

Justice delayed in her case is justice denied.

## II. REQUEST FOR RELIEF

In light of the MAERS defendants' continued disregard for the legal process, Plaintiff respectfully requests:

1. Entry of default sanctions against the MAERS defendants based on their failure to respond to Plaintiff's June 18 motion;
2. Issuance of default judgment in the maximum statutory amount permitted by law, based on the harm and delays caused by Defendants' actions;
3. An Order requiring payment of the full judgment within 48 hours, with automatic additional monetary sanctions if payment is not received within that time.

## III. GROUNDS FOR RELIEF

Under Rule 6 and the Court's inherent enforcement power, where a party fails to respond to a motion within the time provided, the Court may rule in favor of the moving party. MAERS has shown no effort to comply with court orders, participate in this litigation, or respect this process.

Plaintiffs asks the Court to act urgently. Each day of delay diminishes the dignity and safety of this case. The time for further leniency has passed.

#### IV. CONCLUSION

For these reasons, Plaintiff respectfully requests that this Court:

- Grant sanctions by default against MAERS;
- Enter default judgment for the maximum amount allowed by law;
- Order full payment within 48 hours;
- Warn that failure to pay will result in further sanctions without additional notice.

Veronica Hinton 

Vanessa Hinton 

Marcus Hinton 